REMARKS

The Applicant respectfully requests further examination and reconsideration in view of the above amendments and the arguments set forth fully below. Claims 1-54 were pending. Within the Office Action, Claims 1-54 have been rejected. By the above amendments, Claims 1, 12, 22, 31, 41, 45, 52, 53, and 54 have been amended. Accordingly, Claims 1-54 are currently pending.

Claim Rejections Under 35 U.S.C. § 103:

Within the Office Action, Claims 1, 5, 6-13, 16-23, 26-30, 41, 43-45, 47-50, and 52-54 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent Application Publication No. 2004/0098379 issued to Huang (hereafter "Huang") in view of U.S. Patent Application Publication No. 2003/0167318 issued to Robbin et al. (hereafter "Robbin"). The Applicant respectfully disagrees with these rejections because Huang in view of Robbin fail to teach selectively transmitting data by file type.

Huang is directed to a computer program that organizes and manages media files. The computer program includes a database management system for organizing data stored locally on a computer, and a graphical user interface (GUI) for selectively accessing the organized data (Huang, paragraph [0025]). This organization structure is nothing more than a relational database with pointers and indexes (Huang, paragraph [0032]). The media files being managed are locally stored and accessed. In general, there is no transmitting of data from the local computer to secondary devices, such as an MP3 player or a video recorder. In particular, there is no transmitting of data based on the organization of the media files. The Huang application is specifically designed to organize and manage data locally stored in a database on the local computer on which the application is loaded.

Within the Office Action, it is stated that Huang teaches "a controller coupled to the storage device to automatically sort and distribute the digital information based on the type to one or more locations." However, Huang teaches that all imported files are stored in a database.

Within the Office Action, it is stated that Huang discloses a controller that utilizes a routing table to route the digital information. Paragraph [0021] of Huang is cited as teaching the routing table. However, paragraph [0021] of Huang describes importing media files to the computer, and categorizing those imported files. The categorization step includes generating a destination path for each imported file. Regardless of the destination folder to which each

individual imported file is associated, all imported files are considered routed from the external device to the computer. As is well known in the art of computer networking, a routing table is an electronic table (file) or database type object that is stored in a router or a networked computer. The routing table stores the routes (and in some cases, metrics associated with those routes) to particular network destinations. In other words, routing tables are used for the physical transmission of data from one point to another. Within Huang, imported data is always "routed" to the same device, the computer onto which the management application is loaded and to which the imported files are downloaded. As such, there is no "routing table" used by Huang. Instead, each imported file is "organized" into destination folders. However, these folders are abstracts associated with the relational database. The destination folders are not physical network points to which data is routed, which is the purpose of a routing table. As such, Huang does not teach a routing table.

Further, the claimed limitations are directed to using a routing table to route the digital information (dependent claim 6), where the digital information is transmitted to one or more secondary devices (independent claim 1). In other words, the digital information is transmitted from the device that includes the controller that performs the sorting step to another device (a secondary device). In contrast, Huang teaches transmitting media files from an external device to the device (computer) that includes the controller that runs the management application. The direction of data transmission for Huang is opposite that of the presently claimed invention.

Within the Office Action, it is stated that Huang teaches a controller that automatically sorts and distributes the digital information to one or more locations. It is acknowledged within the Office Action that Huang fails to teach that the one or more locations are one or more secondary devices. Robbin is cited as teaching that the one or more locations are one or more secondary devices. The Applicant respectfully disagrees with this conclusion.

Robbin teaches a synchronization application where media content stored on a media player 204 is synchronized with media data stored on a personal computer 204 (Robbin, Figures 1 and 2, paragraph [0028]). Specifically, paragraph [0028] of Robbin includes:

> A synchronization operation between the media content stored on the personal computer and the media content stored on the media player 204 can be achieved in a sophisticated manner through comparison of media information stored in the respective media databases 208 and 210. When comparison of the media information from the respective databases 208 and 210 indicates that there is a particular media item resident on the personal computer 204 but not on the media player 202, then the particular media item can be transmitted (downloaded) to the media player over the peripheral cable 212. On

> the other hand, when the comparison of the media information from the respective databases 208 and 210 indicates that a particular media item is resident on the media player 202 but not on the personal computer 204, then the particular media item can be either removed (deleted) from the media player 202 or transmitted (e.g., uploaded) over the peripheral cable 212 to the personal computer 204.

Robbin teaches a well known synchronization process where specific media items are exchanged between two databases on two separate devices so that the two databases are updated with the same content. This is a two-way flow of data, back and forth between the personal computer 204 and the media player 202. Robbin does not teach that the personal computer 204 selectively transmits data to the media player 202 based on file type.

Within the Office Action, it is acknowledged that Huang fails to disclose distributing the digital information to one or more secondary devices, but that Robbin discloses one or more secondary devices. It is then concluded within the Office Action that it would have been obvious to modify Huang by specifically providing an element, such as taught by Robbin. However, the proposed combination still fails to teach the claimed limitations. As described above, Huang teaches organizing media files within the media storage device (computer). Huang fails to teach any transmission mechanism by which digital information is selectively transmitted by file type. As also described above, Robbin teaches a synchronization process that compares two external databases, media item by media item, to selectively transmit individual media items regardless of file type. Robbin fails to teach selectively transmitting data by file type. The combination of Huang and Robbin leads to an apparatus that is able to store media files on a personal computer, categorize the stored media files on the personal computer, and synchronize the stored media files on a file by file basis with stored files on a secondary device, where the synchronization is done without concern for a file type of the media files. The combination of Huang and Robbin does not teach a device which is able to sort and selectively transmit digital information to an appropriate secondary device based on file type.

In contrast to the combined teachings of Huang and Robbin, the computing device of the presently claimed invention performs automatic content sorting and network routing by file type. The computing device has a central processing unit and a storage device. The storage device stores digital content downloaded from the server and a routing software application. The routing software utilizes a routing table that defines which type of file is associated with which secondary device. The routing software automatically detects which secondary devices are

coupled to the computing device and selectively transmits the digital content to the appropriate secondary device(s) according to the routing table.

The independent Claim 1 is directed to an apparatus for automatically routing digital information. The apparatus of Claim 1 comprises an interface coupled to receive downloaded digital information having a type, a storage device coupled to the interface to store the digital information, and a controller coupled to the storage device to automatically sort and selectively transmit the digital information based on the type to one or more secondary devices. "Type" is understood to mean file type, e.g. .avi, .mp3, .jpg, among others. In contrast, the combination of Huang and Robbin leads to an apparatus that is able to store media files on a personal computer, categorize the stored media files on the personal computer, and synchronize the stored media files on a file by file basis with stored files on a secondary device, where the synchronization is done without concern for a file type of the media files. As described above, neither Huang, Robbin, nor their combination teach a device which is able to sort and selectively transmit digital information to an appropriate secondary device based on file type. For at least these reasons, the independent Claim 1 is allowable over the teachings of Huang, Robbin, and their combination.

Claims 5-11, and 48 are dependent upon the independent Claim 1. As discussed above, the independent Claim 1 is allowable over the teachings of Huang, Robbin, and their combination. Accordingly, Claims 5-11, and 48 are all also allowable as being dependent upon an allowable base claim.

The independent Claim 12 is directed to an apparatus for automatically routing digital information from a computing device to one or more secondary devices. The apparatus of Claim 12 comprises an interface coupled to receive downloaded digital information having a type, a storage device coupled to the interface to store the digital information, and a controller coupled to the storage device to automatically detect the one or more secondary devices, determine which type of digital information is routed to which secondary device, and selectively transmit the digital information to the one or more secondary devices based on the type. As described above, neither Huang, Robbin, nor their combination teach a device which is able to sort and selectively transmit digital information to an appropriate secondary device based on file type. For at least these reasons, the independent Claim 12 is allowable over the teachings of Huang, Robbin, and their combination.

Claims 13, 16-21, and 49 are dependent on the independent Claim 12. As discussed above, the independent Claim 12 is allowable over the teachings of Huang, Robbin, and their combination. Accordingly, Claims 13, 16-21, and 49 are all also allowable as being dependent upon an allowable base claim.

The independent Claim 22 is directed towards an apparatus for automatically routing digital media content from a computing device to one or more secondary devices. The apparatus of Claim 22 comprises an interface coupled to receive downloaded digital media content having a type, a storage device coupled to the interface to store the digital media content, and a controller coupled to the storage device to automatically detect the one or more secondary devices, determine which type of media content is routed to which secondary device utilizing a routing table and selectively transmit the digital media content to the one or more secondary devices based on the type. As described above, neither Huang, Robbin, nor their combination teach a device which is able to sort and selectively transmit digital information to an appropriate secondary device based on file type. For at least these reasons, the independent Claim 22 is allowable over the teachings of Huang, Robbin, and their combination.

Claims 23, 26-30, and 50 are dependent on the independent Claim 22. As discussed above, the independent Claim 22 is allowable over the teachings of Huang, Robbin, and their combination. Accordingly, Claims 23, 26-30, and 50 are all also allowable as being dependent upon an allowable base claim.

The independent Claim 41 is directed to a method for routing digital information from a computing device to one or more secondary devices. The method of Claim 41 comprises receiving the digital information having a type, automatically sorting the digital information based on the type, and automatically transmitting the digital information to a corresponding one or more of the secondary devices based on the type. As described above, neither Huang, Robbin, nor their combination teach a device which is able to sort and selectively transmit digital information to an appropriate secondary device based on file type. For at least these reasons, the independent Claim 41 is allowable over the teachings of Huang, Robbin, and their combination.

Claims 43 and 44 are dependent upon the independent Claim 41. As discussed above, the independent Claim 41 is allowable over the teachings of Huang, Robbin, and their combination. Accordingly, Claims 43 and 44 are both also allowable as being dependent upon an allowable base claim.

The independent Claim 45 is directed to a method for routing digital information from a computing device to one or more secondary devices. The method of Claim 45 comprises

receiving the digital information having a type, automatically detecting the secondary devices, automatically sorting the digital information based on the type, and automatically transmitting the digital information to a corresponding one or more of the secondary devices based on the type. As described above, neither Huang, Robbin, nor their combination teach a device which is able to sort and selectively transmit digital information to an appropriate secondary device based on file type. For at least these reasons, the independent Claim 45 is allowable over the teachings of Huang, Robbin, and their combination.

Claim 47 is dependent on the independent Claim 45. As discussed above, the independent Claim 45 is allowable over the teachings of Huang, Robbin, and their combination. Accordingly, Claim 47 is also allowable as being dependent upon an allowable base claim.

The independent Claim 52 comprises an apparatus for automatically routing digital information comprising media content of different media types including music, video and data. The apparatus of Claim 52 comprises an interface coupled to receive downloaded digital information having a media type, a storage device coupled to the interface to store the digital information and a controller coupled to the storage device to automatically sort and selectively transmit the digital information based on the media type to one or more secondary devices. As described above, neither Huang, Robbin, nor their combination teach a device which is able to sort and selectively transmit digital information to an appropriate secondary device based on file type. For at least these reasons, the independent Claim 52 is allowable over the teachings of Huang, Robbin, and their combination.

The independent Claim 53 comprises a method for routing digital information comprising media content of different media types including music, video and data, from a computing device to one or more secondary devices. The method of Claim 53 comprises receiving the digital information having a media type, automatically sorting the digital information based on the media type and automatically transmitting the digital information to a corresponding one or more of the secondary devices based on the media type. As described above, neither Huang, Robbin, nor their combination teach a device which is able to sort and selectively transmit digital information to an appropriate secondary device based on file type. For at least these reasons, the independent Claim 53 is allowable over the teachings of Huang, Robbin, and their combination.

The independent Claim 54 comprises an apparatus for automatically routing digital media content of different media types including music, video and data, from a computing device to one or more secondary devices. The apparatus of Claim 54 comprises an interface coupled to receive downloaded digital media content having a media type, a storage device coupled to the interface

to store the digital media content and a controller coupled to the storage device to automatically detect the one or more secondary devices, determine which media type of media content is routed to which secondary device utilizing a routing table, the routing table comprising a media type column and a device column and selectively transmit the digital media content to the one or more secondary devices based on the media type. As described above, neither Huang, Robbin, nor their combination teach a device which is able to sort and selectively transmit digital information to an appropriate secondary device based on file type. For at least these reasons, the independent Claim 54 is allowable over the teachings of Huang, Robbin, and their combination.

Within the Office Action, Claims 3, 4, 14, 15, 24, and 25 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Huang in view of Robbin and further in view of U.S. Patent No. 7,043,477 to Mercer et al. (hereafter "Mercer"). Claims 3 and 4 are dependent on the independent Claim 1. Claims 14 and 15 are dependent on the independent Claim 12. Claims 24 and 25 are dependent on the independent Claim 22. As discussed above, the independent Claims 1, 12, and 22 are each allowable over the teachings of Huang, Robbin, and their combination. Accordingly, Claims 3, 4, 14, 15, 24, and 25 are all also allowable as being dependent upon an allowable base claim.

Within the Office Action, Claims 2, 31, 32, 33, 34, 37, 40, 42, 46, and 51 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Huang in view of Robbin and further in view of U.S. Patent No. 6,253,207 to Malek (hereafter "Malek"). Claim 2 is dependent on the independent Claim 1. As discussed above, the independent Claim 1 is allowable over the teachings of Huang, Robbin, and their combination. Accordingly, Claim 1 is also allowable as being dependent upon an allowable base claim.

Malek teaches a method and apparatus for separately transporting each monomedia stream of a composite multimedia signal across a network, such as an ATM network. Malek generally teaches the transfer of packet information from one server to another (Malek, col. 4, lines 6-27). Such packets are embedded with addresses to determine the destination, not routed automatically by a file type. Accordingly, neither Huang, Robbin, Malek, nor their combination teaches any apparatus or method that routes digital information to an appropriate secondary device by file type.

The independent Claim 31 is directed to a network of devices for automatically routing digital information. The network of Claim 31 comprises a server including digital information, a

computing device coupled to the server for obtaining and automatically transmitting the digital information based on a type, and one or more secondary devices coupled to the computing device for receiving the digital information from the computing device. As discussed above, neither Huang, Robbin, Malek, nor their combination teach a controller that automatically distributes the digital information based on the type to one or more secondary devices. For at least these reasons, the independent Claim 31 is allowable over the teachings Huang, Robbin, Malek, and their combination.

Claims 32-34, 37, 40, and 51 are dependent upon the independent Claim 31. As discussed above, the independent Claim 31 is allowable over the teachings of Huang, Robbin, Malek, and their combination. Accordingly, Claims 32-34, 37, 40, and 51 are all also allowable as being dependent upon an allowable base claim.

Claim 42 is dependent on the independent Claim 41. Claim 46 is dependent on the independent Claim 45. As discussed above, the independent Claims 41 and 45 are both allowable over the teachings of Huang, Robbin, and their combination. Accordingly, Claims 42 and 46 are both also allowable as being dependent upon an allowable base claim.

Within the Office Action, Claims 35, 36, 38 and 39 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Huang, Robbin, Malek and further in view of Mercer. Claims 35, 36, 38 and 39 are dependent on the independent Claim 31. As described above, the independent Claim 31 is allowable over the teachings of Huang, Robbin, Malek, and their combination. Accordingly, Claims 35, 36, 38 and 39 are all also allowable as being dependent upon an allowable base claim.

Applicants respectfully submit that the claims are in a condition for allowance, and allowance at an early date would be appreciated. Should the Examiner have any questions or comments, they are encouraged to call the undersigned at (408) 530-9700 to discuss the same so that any outstanding issues can be expeditiously resolved.

Respectfully submitted,
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